

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M.
Williams, Magistrate Judge

**DECLARATION OF ZHP PARTIES' COUNSEL, SETH A. GOLDBERG,
IN SUPPORT OF MOTION FOR PROTECTIVE ORDER**

In accordance with Local Rule 37.1(b)(1), I, Seth A. Goldberg, state:

1. Plaintiffs' failure to provide accurate translations of documents to ZHP party witnesses who do not read English has been in dispute since late March, 2021.
2. This dispute has been the subject of Court conferences on March 29, April 1, April 7, and April 12, 2021.
3. Most recently, I made numerous objections during the deposition of ZHP party witness Qiangming Li based on the inadequate translations provided by Plaintiffs to Mr. Li.
4. At each of those conferences and during the depositions, I spoke to the Court and to opposing counsel in a good faith effort to resolve by agreement

the issues related to Plaintiffs' failure to provide adequate translations to ZHP party witnesses.

5. The parties are unable to reach agreement regarding Plaintiffs' burden to provide true and accurate translations to ZHP party witnesses, or on the right of ZHP party witnesses to refrain from answering questions based on inaccurate translations of documents.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 19, 2021

/s/ Seth A. Goldberg
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